

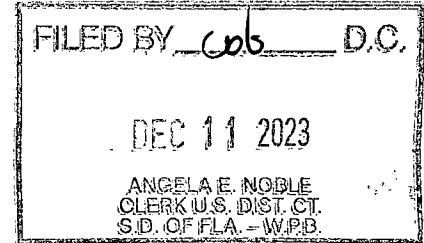


David F. Baron  
Jon M. Herskowitz  
Also admitted in Colorado  
And Washington, D.C.  
Stuart F. Cohen

Of Counsel  
Jack Herskowitz  
Karen B. Bernstein  
Lori Friedman

December 6, 2023

Hon. Donald M. Middlebrooks  
Paul G. Rogers Federal Building and U.S. Courthouse  
701 Clematis Street  
Room 257  
West Palm Beach, Fl. 334013



**Re: *United States v. Michael Dolce*, 23-CR-80063**

Your Honor,

I have been involved in the prosecution of sexual abuse cases for the entirety of my 34 years in practice. Initially as an Assistant State Attorney under Janet Reno and then as a civil practitioner.

I first met Michael Dolce in a sexual abuse case in which we shared interests involving an institutional defendant. I was immediately impressed and awed by Michael because of his candor in discussing his history as a survivor and then in his passion to seek a justiciable remedy for the victim. He went above and beyond and did not relent when discussing settlement nor was deterred by the tough legal issues or the defendants threatening trial.

We spoke a lot and discussed our backgrounds growing up. I would discuss often that my mother was a social worker assisting victims of domestic and sexual abuse for over 35 years in New York City and what she taught me. I knew of Michael's "demons." I knew he still struggled with them. He would often talk about the difficulty survivors and himself face in life. He was always forthright and never hid his struggles.

I was upset but not shocked when I heard Michael was arrested and the crime charged. I am well aware that victims of childhood sexual abuse are struggle with child pornography or other inappropriate actions as if they feel they need to punish themselves by reliving their childhood trauma.

Michael assisted, stood up for, and related to victims of terrible sex crimes. He stood out and assisted countless victims not only in litigation but in sharing his life and letting them know they were not alone and could live productive and successful lives.

It's been many years since I practiced in the criminal area and I'm not sure how much latitude this Court has with the sentencing guidelines, but I believe that the system and hopefully this Court will recognize what Michael has contributed to other victims of childhood sexual abuse and his potential to continue to do so. Michael need not be a lawyer to continue assisting abuse victims, but he cannot do that behind bars. I know he still wants to assist, wants to get the appropriate treatment (finally) for his trauma (which he cannot receive in jail), and continue to live a productive life for his family, friends, clients, and other victims.

I hope that the Court considers what Michael has accomplished and what he can accomplish and weighs those factors when deciding the appropriate punishment.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Jon M. Herskowitz", with a long, sweeping horizontal stroke extending to the right.

Jon M. Herskowitz, Esquire

JMH/j

Jon M. Herskowitz, Esquire  
Baron & Herskowitz P.A.  
9100 S. Dadeland Blvd.  
Suite 1704  
Miami, Florida 33156



MIAMI FL 330

7 DEC 2023 PM 2 L

*happy holidays*



US POSTAGE  
FIRST CLASS  
026W0004897693  
2000236208  
ZIP 33156  
DEC 06 2023

Hon. Donald M. Middlebrooks  
Paul G. Rogers Fed. Building & U.S. Courthouse  
701 Clematis Street  
Room 257  
West Palm Beach, Fl. 334013

33401-511357

